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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13
14 META PLATFORMS, INC.,

15 Plaintiff,

16 v.

17 BRIGHT DATA LTD.

18 Defendant.

19 Case No. 3:23-CV-00077-EMC (AGT)

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28 **JOINT SUBMISSION REGARDING
PROVISIONS IN DISPUTE
CONCERNING THE MODEL
PROTECTIVE ORDER**

1 **JOINT SUBMISSION REGARDING PROVISIONS IN DISPUTE CONCERNING THE**
 2 **MODEL PROTECTIVE ORDER**

3 Pursuant to the Court's order (Dkt. 131), the parties submit this Joint Submission
 4 Regarding Provisions in Dispute Concerning the Model Protective Order. Attached hereto as
 5 **Appendix A** is a full version of the Model Protective Order (i) incorporating the parties' agreed-
 6 upon deviations and (ii) including the parties' competing proposals regarding access to "Highly
 7 Confidential" materials by in-house counsel in different highlighted colors (Meta's in yellow and
 8 Bright Data's in blue). Below is a chart with the disputed paragraph numbers and citations to the
 9 corresponding argument made in the parties' respective briefing in relation to Bright Data's
 10 Motion for Protective Order (Dkts. 106, 107, 112).

12 Paragraph	13 Meta's Argument	14 Bright Data's Argument
14 2.4(*), 7.3(b)(*), 7.4(a)(1), (b), (c) (Designated 15 House Counsel's access to Highly Confidential 16 – Attorneys' Eyes Only materials)	17 Dkt. 107, at pp. 1- 18 2, III.A; Dkt. 108, 19 ¶¶ 14-18	20 Dkt. 106 at 3-4, III; 21 Dkt. 106-1, Ex. C ¶¶ 1- 22 29, 34; Dkt. 112, III
23 8(b) (Designated House Counsel's access to 24 derivative Source Code materials)	25 Dkt. 107, III.B	26 Dkt. 106 at 10 n.8; Dkt. 27 106-1, Ex. C ¶¶ 1-29, 28 34; Dkt. 112, IV

* Because the parties disagree over whether these two provisions should be added, the
 numbering within paragraphs 2 and 7.3 may need to be adjusted, depending on the Court's ruling.
 Upon the Court's ruling, the parties are happy to coordinate and jointly resubmit a clean version
 with the correct numbering.

1 DATED: September 7, 2023
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3 Respectfully submitted,

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CERTIFICATION

I, Sonal Mehta, am the ECF User whose identification and password are being used to file this document and the supporting document. In compliance with Civil L.R. 5-1(h)(3), I hereby attest that each other signatory has concurred in this filing.

Dated: September 7, 2023

/s/ Sonal N. Mehta

Sonal N. Mehta